

1 SONYA Z. MEHTA, SBN 294411
2 SIEGEL, YEE, BRUNNER & MEHTA
3 475 14th Street, Suite 500
Oakland, California 94612
Tel: 510-839-1200
Fax: 510-444-6698
sonyamehta@siegelyee.com

6 DAT HOANG PHAN, SBN 316813
HENNIG, KRAMER, RUIZ AND SINGH, LLP
7 3600 Wilshire Boulevard
Suite 1908
Los Angeles, CA 90010
Tel: 213-310-8301
Fax: 213-310-8302
dat@employmentattorneyla.com

RETU R. SINGLA, SBN 4162822
Tel: 646-228-4719
rsingla@workingpeopleslaw.com
SETH L. GOLDSTEIN, SBN 2160182
Tel: 646-460-1309
Fax: 251-319-2955
sgoldstein@workingpeopleslaw.com
JULIEN MIRER SINGLA AND
GOLDSTEIN PLLC
One Whitehall Street, 16th Floor
New York, NY 10004
ADMITTED PRO HAC VICE

Attorneys for Defendant
TRADER JOE'S UNITED

11

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 TRADER JOE'S COMPANY, a California } Case No. 2:23-cv-05664-HDV-MAR
15 corporation, }
16 } **SINGLA DECLARATION ISO**
17 } **DEFENDANT TRADER JOE'S**
18 Plaintiff, } **UNITED'S APPLICATION TO**
19 } **APPEAR REMOTELY**
20 vs. } Filed Concurrently with Application to
21 TRADER JOE'S UNITED, } Appear Remotely
22 } Hon. Hernán D. Vera
23 } Date: November 9, 2023
Defendant. } Ctrm: 5B
 } Time: 10:00 a.m.
 } Complaint Filed: July 13, 2023

DECLARATION OF ATTORNEY RETU SINGLA

I, RETU SINGLA, declare:

1. I am lead counsel for Trader Joe's United ("TJU" or "the Union") in the instant trademark infringement lawsuit Trader Joe's Company has filed against the Union. I have led this case since its inception, and I am most equipped to argue the motion. Indeed, I will argue the motion.

2. I reside in New York and will have to make a long and expensive trip to Los Angeles to appear in person for the hearing.

3. My client TJU is a fledgling union with extremely modest funds.

4. TJU needs those meager funds to fight a David v. Goliath battle in both organizing Trader Joe's employees, and then securing contracts with the Empl

5. As detailed in the Motion to Dismiss, the National Labor Relations Board has issued multiple unfair labor practices complaints against Plaintiff Trader Joe's Company for its behavior against the Union. There can be no doubt that TJU needs its funds for the many battles currently and ahead.

6. It would significantly impact Trader Joe's United, a fledgling union with extremely modest funds, to have to pay for the flight for me to appear.

7. In addition, by eliminating the need for travel, I will have more time to engage in my frequently pro bono work for working people and newly organizing workers.

I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct. Executed November 1, 2023, in New York, New York.

Dated: November 1, 2023

/s/ Retu Singla

By: Retu Singla

Attorney for Defendant

JULIEN MIRER SINGLA & GOLDSTEIN PLLC
1 Whitehall Street, 16th Floor,
New York, NY 10004
(212) 231-2235
rsingla@workingpeopleslaw.com